



Reference: WC Docket No. 05-196
Compliance Letter

November 28, 2005

Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

Please accept this letter as confirmation of the actions CMA Communications ("CMA") has taken to comply with the FCC's June 3, 2005 order establishing enhanced 911 requirements for interconnected voice over Internet Protocol (VoIP) service providers.

Requirement: Interconnected VoIP service providers must, as a condition of providing service to a consumer, provide that consumer with E911 service as described in this section.

CMA Response: CMA currently provides E911 service as a standard component of its hosted IP Telephony service offering.

Requirement: Interconnected VoIP service providers must transmit all 911 calls, as well as ANI and the caller's Registered Location for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that swerves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to section 64.3001 of this chapter, provided that "all 911 calls" is defined as "any voice communications initiated by an interconnected VoIP user dialing 911".

CMA Response: The CMA VoIP platform currently transmits 911 calls, along with the caller's ANI and Registered Location, to the appropriate emergency operator answering point as a standard component of its hosted VoIP telephony service offering.

Requirement: All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network.

CMA Response: The CMA VoIP service platform currently routes all 911 calls through the use of ANI via services provided by its LEC and/or CLEC carrier partners.

Requirement: The Registered Location must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

CMA Response: The CMA VoIP service platform currently routes all 911 calls through the use of ANI via services provided by its LEC and/or CLEC carrier partners. As such, the Registered Location of the caller is made available to the appropriate emergency operator answering point through the appropriate ALI database.

Requirement: Registered Location Requirement. As of [120 days after the effective date of the Order – November 28, 2005], interconnected VoIP service providers must:

- (1) Obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized.

CMA Response: CMA obtains the physical location at which the services will first be utilized from CMA customer or an authorized representative of the CMA customer and records said location on “Customer Order” once address is verified via Level 3 database as a valid E911 address.

- (2) Provide their end users one or more methods of updating their Registered Location, including at least one option that requires use only of the CPE necessary to access the interconnected VoIP service. Any method utilized must allow an end user to update the Registered Location at will and in a timely manner.

CMA Response: CMA currently enables end users to update their Registered Location information by contacting our 24/7 customer support line where they can speak directly with a CMA support representative and place an order to change the service address. Said contact can be accomplished via use of the CPE necessary to access the CMA VoIP service platform.

Requirement: Customer Notification. Each interconnected VoIP service provider shall:

- (1) Specifically advise every subscriber, both new and existing, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service or may be in some way limited by comparison to traditional E911 service. Such circumstances include, but are not limited to, relocation of the end user's IP-compatible CPE, use by the end user of a non-native telephone number, broadband connection failure, loss of electrical power, and delays that may occur in making a registered Location available in or through the ALI database.

CMA Response: CMA informs subscriber or an authorized agent of subscriber of such limitations, which are clearly listed on the "Subscriber Acceptance" form which is executed by subscriber prior to initiation of services. Further acknowledgements are made in printed "getting Started Guides" presented to subscriber upon initiation of VoIP services.

- (2) Obtain and keep a record of affirmative acknowledgment by every subscriber, both new and existing, of having received and understood the advisory described in subparagraph (1).

CMA Response: CMA currently maintains an executed original document used for acknowledgement of the "Registered Location" as well as acknowledgment of possible limitations of E911 inclusive of the various potential reasons.

- (3) Distribute to its existing subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on or near the equipment used in conjunction with the interconnected VoIP service. Each interconnected VoIP provider shall distribute such warning stickers or other appropriate labels to each new subscriber prior to the initiation of that subscriber's service.

CMA Response: CMA is currently placing said warning stickers on all CPE devices used for VoIP services and has provided stickers to all active existing subscribers. 100% compliant.

(f) Compliance Letter: All interconnected VoIP providers must submit a letter to the commission detailing their compliance with this section no later than [120 days after the effective date of this Order – November 28, 2005].

CMA Response: CMA has prepared and submitted this Compliance Letter.

Please contact Steve Sizemore at 972-233-9614 extension 1358 or e-mail at steves@creditprotect.com if you have any questions or concerns with this submittal.

Thank you,

Steve Sizemore
Director of Advanced Services
CMA Communications